

EXHIBIT R

IN THE UNITED STATES COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL NO. 2804  
OPIATE LITIGATION

Case No. 17-mdl-284  
Judge Dan Polster

This document relates to:  
The County of Summit, Ohio, et al.,  
V.  
Purdue Pharma L.P., et al.,  
Case No. 1:18-OP-45090 (N.D. Ohio)

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Videotaped deposition of
ERIC HUTZELL
January 8, 2019
9:09 a.m.

Taken at:
Jackson Kelly PLLC
50 South Main Street Street
Akron, Ohio
Wendy L. Klauss, RPR

1 Motley Rice, for the City of Akron and Summit
2 County --

3 MR. SALIMBENE: I can't hear great
4 on the phone, but this is Michael Salimbene for
5 AmerisourceBergen.

6 MR. PADUKONE: Hi. This is Aseem
7 Padukone, from Covington & Burling, on behalf
8 of McKesson Corporation.

9 MR. SCHINNER: Greg Schinner, of
10 Arnold & Porter, on behalf of the Endo and Par
11 Defendants.

12 THE VIDEOGRAPHER: Would the court
13 reporter please swear in the witness.

14 ERIC HUTZELL, of lawful age, called
15 for examination, as provided by the Statute,
16 being by me first duly sworn, as hereinafter
17 certified, deposed and said as follows:

18 EXAMINATION OF ERIC HUTZELL

19 BY MR. MASTERS:

20 THE VIDEOGRAPHER: Hold on one
21 second. I apologize.

22 Off the record, 9:11.

23 (Recess taken.)

24 THE VIDEOGRAPHER: On the record,
25 9:23.

1 001774240, was marked for purposes
2 of identification.)

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4 Q. Mr. Hutzell, I'm showing you what
5 has been marked as Exhibit 1. Do you recognize
6 this document, Mr. Hutzell?

7 A. Yes, I do.

8 Q. What is it?

9 A. It's my cover letter and resume.

10 Q. Who is Aimee Wade?

11 A. She is the associate clinical
12 director of the Summit County ADM Board.

13 Q. Did you know her prior to sending
14 this application?

15 A. Yes, I did.

16 Q. It looks like this was dated March
17 7, 2016. When were you hired at Summit ADM?

18 A. When was I hired or when did I
19 start?

20 Q. When did you start?

21 A. I started on May 2, 2016.

22 Q. If you turn to the second page,
23 which is -- which appears to be a cover letter
24 written by you; is that right?

25 A. Yes, sir.

1 in this case, and we have asked you about a
2 number of the defendants.

3 So is it fair to say that you
4 cannot link any of the overdose deaths in
5 Summit County directly to any particular
6 defendants in this case?

7 MR. LEDLIE: Same objection.

8 A. Not from my analysis.

9 Q. And a similar question, you cannot
10 link any overdose deaths for prescriptions
11 filled in Summit County by any of the national
12 retail defendants?

13 A. Not from my analysis.

14 Q. You're not aware of any patient who
15 overdosed with prescription opioids from
16 Walmart, are you?

17 A. No.

18 Q. Okay. And the same is true for any
19 other retail pharmacy defendants that we
20 mentioned earlier?

21 A. None that somebody has said, no.

22 Q. And you cannot identify any
23 individual in Summit County who died because of
24 prescription opioids that were properly
25 distributed by Walmart or any of the other